

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
RALEIGH DIVISION

In re:

KIMBERLY IYANA RICHARDSON

Debtor.

Case No. 15-00021-5-SWH

Chapter 13

OPPOSITION TO MOTION TO DISMISS

Kimberly Iyana Richardson, the Debtor in the above-captioned case (the “Debtor”), hereby opposes the motion to dismiss filed by the Chapter 13 Trustee on or about April 27, 2015. In support of this opposition the Debtor respectfully represents:

1. The Trustee’s motion indicates that the Debtor’s plan is not feasible and the Debtor’s 2014 State Tax Return has not been provided.
2. The Debtor request that this matter be set for hearing.

WHEREFORE, the Debtor respectfully requests that the motion to dismiss be denied; that a hearing be scheduled prior to dismissal; and for such other and further relief as the Court deems just and proper.

Respectfully submitted this the 18th day of May, 2015.

s/William G. Berggren  
William G. Berggren  
State Bar No. 18675  
BERGGREN LAW OFFICES, PLLC  
Post Office Box 18306  
Raleigh, NC 27619  
Telephone (919) 875-8773  
Telecopier (919) 875-0882  
wgb@raleighbankruptcy.com

CERTIFICATE OF SERVICE

I, William G. Berggren, of BERGGREN LAW OFFICES, PLLC, hereby certify:

That I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age;

That on the 18th day of May 2015, I served the “Opposition To Motion To Dismiss” by causing a true and correct copy thereto to be served electronically on the parties listed below:

John F. Logan

I certify under penalty of perjury that the foregoing is true and correct.

This the 18th day of May, 2015.

BERGGREN LAW OFFICES, PLLC

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